

To: Mia, Marcia[Mia.Marcia@epa.gov]; Hambrick, Amy[Hambrick.Amy@epa.gov]; Thompson, Lisa[Thompson.Lisa@epa.gov]; marsh.karen@epa.gpv[marsh.karen@epa.gpv]
From: Patty Centofanti
Sent: Thur 7/27/2017 2:39:35 PM
Subject: RE: NSPS OOOOa Modification of a Compressor Station 40 CFR 60.5365a(j)

Thanks again for your time to discuss my NSPS OOOOa LDAR questions on our call today. I've included a few notes below on the scenarios we discussed and would appreciate your comments on each point below. Any regulatory references that helps support EPA's interpretation is also appreciated.

Scenario #1:

- a) A new greenfield site commences construction on gas compression equipment (i.e., inlet separator, piping/components, gas-compressors, dehydrators, etc) as well as liquids processing (i.e., forced extraction of liquids from natural gas). The entire site (with the exception of the compressors themselves) will be considered a "*Process unit*" as defined in 40 CFR 60.5430a. (i.e., The site will not be both a "40 CFR 60.5397a Compressor Station" and a "40 CFR 60.5400a Process Unit".)
- b) Must comply with 40 CFR 5400a LDAR within 180 days of startup. Since Subpart A defines startup as "the setting in operation of an affected facility for any purpose"; the beginning of the 180 day period will be the facility begins flowing natural gas.
- c) The site will not be subject to "40 CFR 60.5397a Compressor Station" LDAR at any time.

Scenario #2:

- a) An existing compressor station (pre-NSPS) plans to add both gas compression equipment (i.e., inlet separator, piping/components, gas-compressors, dehydrators, etc) as well as liquids processing (i.e., forced extraction of liquids from natural gas). The new gas compressors (as well as related piping/components, dehydration equipment) will startup several months in advance of the processing equipment (could be as little as 2 months to as much as 8 months in advance). Based on our discussions today, it sounds like EPA would still consider the entire site (excluding the compressors themselves) as a "40 CFR 60.5400a Process Unit" affected facility. And there would not be a "40 CFR 60.5397a Compressor Station" at any time.
- b) Must comply with 40 CFR 5400a LDAR within 180 days of startup. Since Subpart A defines startup as "the setting in operation of an affected facility for any purpose"; the beginning of the 180 day period will be the facility begins flowing natural gas through one of the new compressors regardless if the processing equipment has begun extracting liquids during the 180

day period.

c) The site will not be subject to “40 CFR 60.5397a Compressor Station” LDAR at any time regardless of the 2 to 8 month gap.

Scenario #3:

a) Same as Scenarion #2 except that for some reason the processing equipment was not fully installed/operated as planned and permitted. Would the site need to know this within the first 60 days after startup to comply with “40 CFR 60.5397a Compressor Station” LDAR? If not, would the site then be out of compliance with “40 CFR 60.5397a Compressor Station” LDAR?

Thanks,

Patty Centofanti

Trinity Consultants

Cell: 412-538-8038